UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	No. 4:13 CR 00222 JAR (SPM)
v.	)	
	)	
THOMAS ZELL,	)	
	)	
Defendant.	)	
	)	

GOVERNMENT'S MOTION FOR DETENTION

Comes now the United States of America, by and through Assistant United States Attorney

Erin Granger, and moves this Court to detain defendant pending trial and further requests that a

detention hearing be held three (3) days from the date of defendant's initial appearance before the

United States Magistrate pursuant to Title 18, United States Code, Section 2251, et seq.

The Government asserts:

1) Because of defendant's present charge, there is a presumption that no conditions of bond

can ensure the community's safety.

Defendant is charged with Receipt of Child Pornography, in violation of Title 18, U.S.C.,

Section 2252.

Title 18, U.S.C. Section 3142(e) states that:

Subject to rebuttal by the person, it shall be presumed that no condition or combination of
conditions will reasonably assure the appearance of the person as required and the safety of
the community if the judicial officer finds that there is probable cause to believe that the
person committed an offense...involving a minor victim under section...2252...

Defendant cannot show that there is any condition or combination of conditions that will

assure the safety of the community.

 2) There is a serious risk that the defendant will flee.

 WHEREFORE, the Government respectfully requests that the Court order the defendant to

be detained pending trial.

     Respectfully submitted,
     RICHARD G. CALLAHAN
     United States Attorney

      /s/ Erin Granger
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     Assistant United States Attorney
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